## **EXHIBIT B**

**Declaration of Scott Reeves** 

## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

COAST TO COAST TITLE, LLC, SOL SOL CITY TITLE, LLC, MAGNOLIA TITLE ARKANSAS, LTD., MAGNOLIA TITLE FLORIDA, LLC, THE PEABODY, BULLDOG LLC, AND JOHN MAGNESS **Plaintiffs** CIVIL ACTION NO.: 4:24-cv-2767 v. TYRELL L. GARTH, PHILLIP H. CLAYTON, DEBBIE MERRITT A/K/A DEBORAH MERRITT, MATTHEW D. § HILL, CHARLES BURNS, P. GARRETT 999999999999 CLAYTON, SCOTT M. REEVES. ARIANE E. YOUNG, TINGLEMERRITT, LLP, STARREX TITLE FLORIDA, LLC, LAURIE COOPER, MARKETSTREET CAPITAL PARTNERS, LLC, MARKETSTREET CAPITAL PARTNERS AR, LLC AND BRIAN A. BREWER Defendants.

## **Declaration of Scott Reeves**

- 1. My name is Scott Reeves. My birthdate is May 19, 1969. My address is 210 Grizzly Rise, Cochrane, Alberta CANADA T4C 0B5. I have personal knowledge of the facts stated in this declaration.
- 2. I am a citizen and resident of Canada.

- 3. I have served as a Director of the Board of Starrex International Ltd. ("Starrex Ltd.") since December 4, 2019.
- 4. I am also, separately, a partner of the Canadian law firm TingleMerrett, LLP.
- 5. My engagement as a director of Starrex Ltd. is done in my individual capacity, not as a partner of TingleMerrett.
- 6. I am not compensated for any of my work as a director of Starrex Ltd. by TingleMerrett. TingleMerrett does not bill Starrex Ltd. for my work serving as a director. Instead, TingleMerrett bills Starrex Ltd *only* for legal work performed, whether by me or some other attorney at TingleMerrett.
- 7. Whether I choose to serve as a director of any entity—including Starrex Ltd.—is an individual choice and is not mandated or suggested by TingleMerrett.
- 8. I have travelled to Texas one time for business related to Starrex Ltd on November 17, 2021, however, that trip was for the purpose of a transaction unrelated to the allegations in this matter.

I swear under penalty of perjury under the laws of the United States and Canada that the foregoing is true and correct.

SIGNED on July 31, 2024, in Calgary, Alberta, Canada.